

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

FELIPE GONZALEZ, on his own behalf, and  
on behalf of all similarly situated persons,  
Plaintiffs,

Civil Action No. 21-cv-2834-CC-ESK

-against-

EXITO JC INC., aka  
EXITO FRESH MARKET, JOHN DOE  
CORPORATIONS 1 THROUGH 10, AND  
OTHER JOHN DOE ENTITIES 1  
THROUGH 10, and all other affiliated entities  
and/or joint employers ,all whose true names  
are unknown, TANUJA PATEL, individually,  
BINDITA PATEL, individually, JAYESH  
PATEL, individually, PIYUSH PATEL,  
individually, and JOHN and JANE DOES 1  
THROUGH 10, individually, all of whose true  
names are unknown,

Defendants.

**STIPULATION AND ORDER OF DISMISSAL WITH PREJUDICE**

**WHEREAS**, Plaintiff filed a Complaint which asserts claims pursuant to the Fair Labor Standards Act, 29 U.S.C. § 201, *et seq.* and the New Jersey Wage and Hour Law; and

**WHEREAS**, there is a bona fide dispute with respect to whether Plaintiff is owed wages by Defendants, and, if so, in what amount;

**WHEREAS**, the parties reached a settlement of this action and Plaintiff's claims through arms' length negotiations; and

**WHEREAS**, this Court shall retain jurisdiction to enforce the terms of the parties' settlement.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the undersigned counsel for the parties, and ordered by this Court, that this action be hereby dismissed and

discontinued in its entirety, with prejudice, pursuant to Rule 41(a)(2) of the Federal Rules of Civil Procedure. A copy of the signatures on this Stipulation serve the same purposes as an original signature.

Dated: June 30, 2022



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SO ORDERED

s/Claire C. Cecchi  
Claire C. Cecchi, U.S.D.J.

Date: 7/18/2022